

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Daily News, LP; The Chicago Tribune Company, LLC; Orlando Sentinel Communications Company, LLC; Sun-Sentinel Company, LLC; San Jose Mercury-News, LLC; DP Media Network, LLC; ORB Publishing, LLC; and Northwest Publications, LLC,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI, INC., OPENAI LP, OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO, LLC, OPENAI GLOBAL, LLC, OAI CORPORATION, LLC, and OPENAI HOLDINGS, LLC,

Defendants.

Civil Action No. 1:24-cv-03285-SHS

**PLAINTIFFS' FIRST SET OF INTERROGATORIES TO OPENAI, INC., OPENAI LP, OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, AND OPENAI HOLDINGS, LLC**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, and Rule 33.3(a) of the Local Civil Rules of the United States District Court for the Southern District of New York (the "Local Civil Rules"), Plaintiffs Daily News, LP (the "New York Daily News"); The Chicago Tribune Company, LLC, (the "Chicago Tribune"); Orlando Sentinel Communications Company, LLC (the "Orlando Sentinel"); Sun-Sentinel Company, LLC (the "Sun-Sentinel"); San Jose Mercury-News, LLC (the "Mercury News"); DP Media Network, LLC (the "Denver Post"); ORB Publishing, LLC (the "Orange County Register"); and Northwest Publications, LLC (the "Pioneer Press") (collectively the "Plaintiffs") request that OpenAI, Inc., OpenAI LP, OpenAI GP, LLC., OpenAI, LLC., OpenAI, OpCo LLC., OpenAI Global, LLC., OAI Corporation, LLC., and OpenAI Holdings, LLC. ("OpenAI Defendants") send written responses

21. “Retrieval Augmented Generation” means the process of retrieving information from a data source and passing that information to a Generative AI Model, including the methods described at: <https://help.openai.com/en/articles/8868588-retrieval-augmented-generation-rag-and-semantic-search-for-gpts>, <https://platform.openai.com/docs/guides/optimizing-llm-accuracy/retrieval-augmented-generation-rag>, <https://learn.microsoft.com/en-us/azure/search/retrieval-augmented-generation-overview>, and <https://techcommunity.microsoft.com/t5/fasttrack-for-azure/grounding-llms/ba-p/3843857>.

## **II. INSTRUCTIONS**

1. These Interrogatories are continuing and require supplemental responses as specified in Federal Rule of Civil Procedure 26(e).

2. These interrogatories should be answered in accordance with Local Civil Rules 33.3(a) and 33.3(b)(1).

## **III. INTERROGATORIES**

### **INTERROGATORY NO. 1:**

Identify each instance of Publisher Content included in Your Training Datasets for Your Generative AI Products and Services, including for each instance: (i) the contents, (ii) the source of origin, including any URLs from the Publishers’ Domains; (iii) the Training Dataset containing the instance and the purpose of that Training Dataset; and (iv) any metadata.

### **INTERROGATORY NO. 2:**

Identify each instance of Publisher Content used, referenced, or accessed as part of Retrieval Augmented Generation methods for Your Generative AI Products and Services, including for each instance: (i) the contents, (ii) the source of origin, including any URLs from the Publishers’ domains, and (iii) any metadata.

Dated: August 8, 2024

/s/Jennifer B. Maisel

Steven Lieberman (SL8687)

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**CERTIFICATE OF SERVICE**

It is hereby certified that, on August 8, 2024, the foregoing **PLAINTIFFS' FIRST SET OF INTERROGATORIES TO OPENAI, INC., OPENAI LP, OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, AND OPENAI HOLDINGS, LLC** was served by email upon the following counsel of record:

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/s/Nasri V. B. Hage  
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